

EXHIBIT 1

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Orly Genger,

Debtor.

Case No. 19-13895 (JLG)

DECLARATION OF YOVEL NACHMANI

1. I am an attorney duly admitted to practice law in Israel. I submit this declaration to update this Court on the ongoing criminal investigation in Israel related to the illegally obtained personal banking and travel information of Eric Herschmann (“Herschmann”) and Orly Genger (“Genger”).

2. On October 19, 2020 I met with the Head of the Israel Police Jerusalem Fraud Division (the “Fraud Division”) and the principal officer in case file no. 440494/2019 for an update since I am the attorney in Israel for the victims.

3. On October 25, 2020 I received an update (the “Letter Receipt Confirmation”) from the Fraud Division about the ongoing criminal investigation into Sasson Matityahu (“Sagi’s Private Investigator”) and others related to Herschmann and Genger

4. The Police informed me that they have recently, on two separate occasions, interrogated Sagi’s Private Investigator related to how he obtained Herschmann’s and Genger’s personal banking and travel records and that the criminal investigation is still ongoing (*see Letter Receipt Confirmation, with English translation, annexed hereto as Exhibit A*)

Executed on: October 31, 2020

Yovel Nachmani

Exhibit A

אישור קבלת מכתב

פרטים כלליים

טלפון: 025683286
 פקס: 02-5683121
 מס' מסמר בתיק: נב
 נושא המסמך: פניות עו"ד יובל נחמני
 תאריך: 25/10/2020, ז' חשוון תשפ"א, 11:49
 כתובות: התנהכה 19, תלפיות ירושלים
 ייחידה: מפלג הונאה ופשיעה כלכלית
 מספר תיק פלא: 440494/2019
 סיום תיק: ג.א.
 כבוד א/ג/ג: עו"ד יובל נחמני

ב痼שנו ביחס להתקדמות התקין
 ב痼שא: 22/10/2020
 מיום קבלת מכתב

אם מטפלים בעניין עם סיום הטיפול נודיעו.

הרם להודיער כי

- 1. בתיק החקירה מבוצעות פעולות רבות לרבות קבלת נתונים מסוימים שוניים.
- 2. בתיק החקירה נערך החשוד המרכז פעעים בנושא הבלתי אך החקירה טרם הושלמה.
- 3. כדי שיענו בಗיון ב进展情况, אנו עושים שימוש במסמכים לקדום החקירה ובבזבז כי מדובר בהליך משפטי מתקיים בארץ בין הצדדים ועל כן הדוחות.

בתשובה נא להזכיר מס' ג"א: 440494/2019

כבוד רב

	אזריך	שם פרטי:	ס.מ.ל	שם משפחה	מ"א
				955556	

דרגה

רופא

חתימה

File Number: 440494 / 2019
Document ID: M149309914

ISRAEL POLICE

LETTER RECEIPT CONFIRMATION

GENERAL DETAILS

UNIT: Fraud and Financial Crimes Division

TELEPHONE: 025683286

FILE NUMBER: 440494 / 2019

FAX: 02-5683121

CASE CLASSIFICATION: F.A.

FILE DOCUMENT NO.: 52

DATE: October 25, 2020, 11:49

DOC. SUBJECT: Request of Atty. Yovel
Nachmani

ADDRESS: 19 Hatnufa, Talpiot, Jerusalem

TO: Attorney Yovel Nachmani

CONFIRMATION of
RECEIPT of LETTER

DATED: October 22, 2020

SUBJECT: Meeting regarding progress of the Investigation

We are working on this issue and will advise once finished

This is to inform you

1. In the investigative file many operations are performed including receiving data from various sources
2. In the investigative file the main suspect was interrogated twice regarding the complaint but the investigation has not yet been completed
3. As noted in our meeting, we are making efforts to further the investigation and understand that this involves an ongoing case in the United States between the parties and therefore the urgency

When answering please reference file number: 440494 / 2019

Sincerely

ID No. 955559

Last Name Siman

First Name Isak

Rank: Superintendent

Signature _____

Stamp of Izak Siman, Attorney